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*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V.  
PRITT IN SUPPORT OF PLAINTIFFS'  
SUMMARY JUDGMENT OPPOSITION  
AND REPLY**

I, Maxwell V. Pritt, declare as follows:

I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Reply to Motion for Partial Summary Judgment and Opposition to Meta’s Motion for Partial Summary Judgment.

1. Attached as **Exhibit 97** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00211192.

2. Attached as **Exhibit 98** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Christopher King, which took place on April 2, 2025.

3. Attached as **Exhibit 99** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00112111

4. Attached as **Exhibit 100** is a true and correct copy of the full transcript of the deposition of Professor David Choffnes, which took place on March 28, 2025.

5. Attached as **Exhibit 101** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00065631.

6. Attached as **Exhibit 102** is a true and correct copy of excerpts of the transcript of the deposition of Nikolay Bashlykov, which took place on December 5, 2024.

7. Attached as **Exhibit 103** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Nikolay Bashlykov, which took place on December 6, 2024.

8. Attached as **Exhibit 104** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00218907.

9. Attached as **Exhibit 105** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00231286.

10. Attached as **Exhibit 106** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00101706.

11. Attached as **Exhibit 107** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00233772.

12. Attached as **Exhibit 108** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00237719

13. Attached as **Exhibit 109** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Chaya Nayak, which occurred on April 3, 2024.

14. Attached as **Exhibit 110** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00080277.

15. Attached as **Exhibit 111** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00074217.

16. Attached as **Exhibit 112** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00019627. This document is a native Excel spreadsheet, which Plaintiffs will provide to the Court in an electronic service copy.

17. Attached as **Exhibit 113** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00028015. This document is a 1,400-page json file that is too large for ECF filing. Plaintiffs will provide this document to the Court in an electronic service copy.

18. Attached as **Exhibit 114** is a true and correct copy of a series of documents produced by Meta. The parent document contains first Bates Number Meta\_Kadrey\_CT\_00086196, which is a certified translation of a document originally written in French. Appended to this exhibit are documents Meta\_Kadrey\_00086237 and Meta\_Kadrey\_00086238, which were two of many attachments to the parent document.

19. Attached as **Exhibit 115** is a true and correct copy of select excerpts from Plaintiffs' Rebuttal Expert Report of Professor Emily Bender.

20. Attached as **Exhibit 116** is a true and correct copy of excerpts of the transcript of the deposition of Professor Emily Bender, which took place on February 25, 2025.

21. Attached as **Exhibit 117** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00237186.

22. Attached as **Exhibit 118** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_0054433.

23. Attached as **Exhibit 119** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00000277. This document is a native PowerPoint presentation, which Plaintiffs will provide to the Court in an electronic service copy.

24. Attached as **Exhibit 120** is a true and correct copy of excerpts of the transcript of the deposition of David Esiobu, which took place on December 13, 2024.

25. Attached as **Exhibit 121** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00049649.

26. Attached as **Exhibit 122** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00063146.

27. Attached as **Exhibit 123** is a true and correct copy of excerpts of the transcript of the deposition of Professor Lyle Ungar, which took place on February 26, 2025.

28. Attached as **Exhibit 124** is a true and correct copy of select excerpts from Plaintiffs' Rebuttal Expert Report of Professor Cristina Videira Lopes.

29. Attached as **Exhibit 125** is a true and correct copy of excerpts of the transcript of the deposition of Yann LeCun, which took place on November 21, 2024.

30. Attached as **Exhibit 126** is a true and correct copy of select excerpts from Plaintiffs' Opening Expert Report of Professor Daniel Spulber.

31. Attached as **Exhibit 127** is a true and correct copy of excerpts of the transcript of the deposition of Sarah Silverman, which took place on October 10, 2024.

32. Attached as **Exhibit 128** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00152235.

33. Attached as **Exhibit 129** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00153810.

34. Attached as **Exhibit 130** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00153824.

35. Attached as **Exhibit 131** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00153924.

36. Attached as **Exhibit 132** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00146678.

37. Attached as **Exhibit 133** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Sy Choudhury, which took place on December 5, 2024.

38. Attached as **Exhibit 134** is a true and correct copy of a document produced by Hachette Book Group with the first Bates Number HBG00002.

39. Attached as **Exhibit 135** is a true and correct copy of a document produced by HarperCollins with the first Bates Number HC0734.

40. Attached as **Exhibit 136** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00237702.

41. Attached as **Exhibit 137** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_Meta\_Kadrey\_00179968.

42. Attached as **Exhibit 138** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00172888.

43. Attached as **Exhibit 139** is a true and correct copy of a document produced by HarperCollins with the first Bates Number HC0757.

44. Attached as **Exhibit 140** is a true and correct copy of excerpts of the transcript of the deposition of Chris Bakewell, which took place on February 21, 2025.

45. Attached as **Exhibit 141** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00152927.

46. Attached as **Exhibit 142** is a true and correct copy of select excerpts from Meta's Opening Expert Report of Professor Michael Sinkinson.

47. Attached as **Exhibit 143** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00044885.

48. Attached as **Exhibit 144** is a true and correct copy of excerpts of the transcript of the deposition of Professor Michael Sinkinson, which took place on March 4, 2025.

49. Attached as **Exhibit 145** is a compilation of true and correct copies of select excerpts from Plaintiffs' depositions.

50. Attached as **Exhibit 146** is a true and correct copy of select excerpts from Plaintiffs' Opening Expert Report of Professor Jonathan Krein.

51. Attached as **Exhibit 147** is a true and correct copy of select excerpts from Plaintiffs' Opening Expert Report of Professor Cristina Videira Lopes.

52. Attached as **Exhibit 148** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00063472.

53. Attached as **Exhibit 149** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00054518.

54. Attached as **Exhibit 150** is a true and correct copy of excerpts of the transcript of the deposition of Hugo Touvron, which occurred on December 3, 2024.

55. Attached as **Exhibit 151** is a true and correct copy of select excerpts from Defendant's Opening Expert Report of Professor Lyle Ungar.

56. Attached as **Exhibit 152** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00053071.

57. Attached as **Exhibit 153** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00048554.

58. Attached as **Exhibit 154** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00080247.

59. Attached as **Exhibit 155** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Michael Clark on the topic of mitigations, which occurred on March 3, 2025.

60. Attached as **Exhibit 156** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00054905.

61. Attached as **Exhibit 157** is a true and correct copy of excerpts of the transcript of the deposition of Chaya Nayak, which occurred on October 31, 2024.

62. Attached as **Exhibit 158** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00049684.

63. Attached as **Exhibit 159** is a true and correct copy of excerpts of the transcript of the Rule 30(b)(6) deposition of Michael Clark, which occurred on November 20, 2024.

64. Attached as **Exhibit 160** is a true and correct copy of a document produced by Meta with the first Bates Number Meta\_Kadrey\_00054416.

65. Attached as **Exhibit 161** are true and correct copies of excerpts of Plaintiffs' Responses to Meta's Requests for Admission.

66. Attached as **Exhibit 162** are true and correct copies of excerpts of Meta's Responses to Plaintiffs' Requests for Admission.

67. Attached as **Exhibit 163** is a true and correct copy of select excerpts from Meta's Second Rebuttal Report of Barbara Frederiksen-Cross.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of April 2025 in San Francisco, California.

By:

/s/ Maxwell V. Pritt  
Maxwell V. Pritt